

BEFORE THE ILLINOIS COMMERCE COMMISSION

Docket No. 04-0469

**Direct Testimony of Jason E. Constable
On Behalf of SBC Illinois**

SBC Illinois Exhibit 4.0

August 17, 2004

ISSUES

LIDB ISSUES 6, 7, 10

CNAM ISSUES 1, 2, 3, 8, 9

LIDB AND CNAM AS 1, LIDB 1

800 ISSUES 1, 3

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DIRECT TESTIMONY OF JASON E. CONSTABLE

ON BEHALF OF SBC ILLINOIS

I. INTRODUCTION AND PURPOSE OF TESTIMONY

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Jason E. Constable. My business address is 308 S. Akard, Room 710,
Dallas, Texas 75202.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by SBC Operations, Inc. as an Area Manager – Network Regulatory.

Q. WHAT ARE YOUR DUTIES AND RESPONSIBILITIES IN THAT CAPACITY?

A. My primary responsibility is to represent SBC and its various operating companies in the
development of network policies, procedures, and plans from both a technical and
regulatory perspective. I am also responsible for representing the companies' network
organizations in negotiations with CLECs.

Q. HOW LONG HAVE YOU SERVED IN THAT CAPACITY?

A. Approximately 1 year.

Q. WHAT IS YOUR TELECOMMUNICATIONS EXPERIENCE?

A. I have had a variety of telecommunications experience that includes Tier 1 hardware
maintenance for various end office switches. I have also managed crews of technicians
who were responsible for the resolution of Advanced Intelligent Network (AIN) and

Local Number Portability (LNP) trouble tickets and correcting routing and charging translations errors in end office switches. I have also performed as a system administrator and Tier 2 support for the SBC Southwest call-related databases, including AIN, Line Information Database (LIDB), and 800. For each of these positions I have been trained, and received numerous certifications, from Telcordia and other telecommunications vendors.

Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?

A. I received an Associate Degree in the Arts from Tulsa Community College, and a Bachelors Degree in Elementary Education (magna cum laud) from Langston University.

Q. HOW DOES YOUR TESTIMONY RELATE TO THE TESTIMONY OF PATRICIA PELLERIN?

A. Patricia Pellerin's testimony articulates SBC Illinois' position on LIDB, CNAM, LIDB AS and 800 from a policy perspective. My testimony explains why technical and network considerations support SBC Illinois' position on these issues.

II. LIDB ISSUES (6, 7, & 10)

Q. WHAT IS LIDB?

A. LIDB, or Line Information Database, is an SS7 network database in which carriers store information about their end user accounts. LIDB contains end user and carrier proprietary information on virtually every working telephone number provided by the

storing carrier, as well as the programming logic, to perform query/response processing. LIDB enables carriers to access data to provide for call routing, transmission, billing and collections, or other provisions of a telecommunications service. SBC Illinois currently utilizes LIDB to respond to validation queries, such as Billed Number Screening (“BNS”) and Calling Card queries. Collectively, these queries validate requests for alternately billed calls, such as collect calls, calling card calls, and bill to third party number calls.

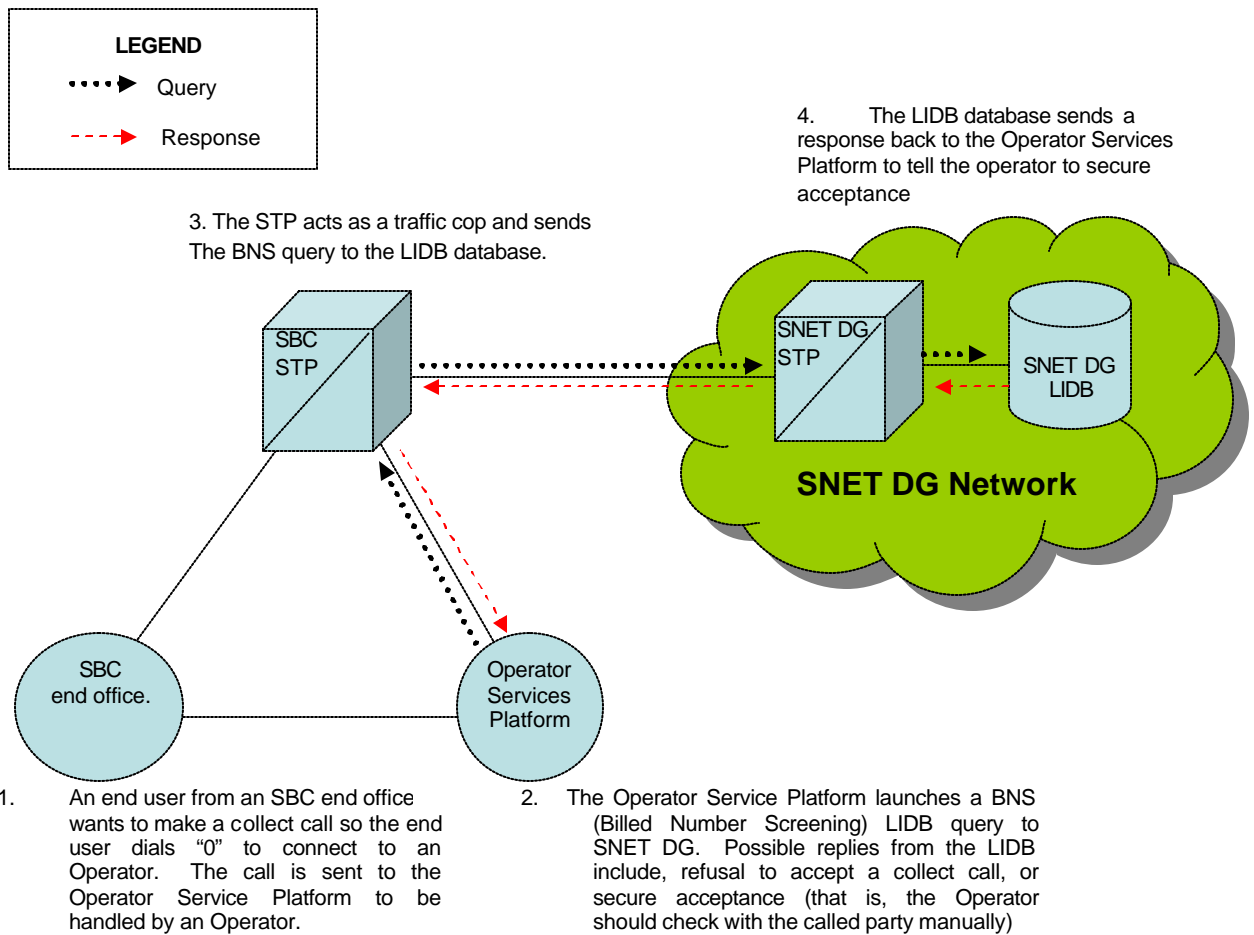
Q. DOES SBC ILLINOIS HAVE A LIDB?

A. No. SBC Illinois does not own a LIDB. SBC Illinois uses the third-party LIDB provider, Southern New England Telephone Diversified Group (“SNET DG”), to obtain its LIDB services. SNET DG is a Connecticut-based corporation and its LIDB resides in Connecticut.

Q. HOW DOES LIDB WORK?

A. LIDB works through the SS7 network. For validation queries a Traffic Operator Service Position (“TOPS”), also known as an Operator Service Platform (“OSP”), detects that it needs the LIDB to validate a billing request. The TOPS/OSP then sends an SS7 message, called a query, to the STP, or Signal Transfer Point. The STP then sends that query to SNET DG, where SNET DG’s LIDB is accessed. SNET DG’s LIDB then sends back an SS7 message called a response with the information requested by the query. A diagram of a Bill Number Screening query is set out below.

68



69

70 **Q. CAN YOU DESCRIBE OSP AND TOPS IN MORE DETAIL?**

71 A. Yes. Operator Services traffic, such as 0, 00, and 0+7/10 digit, routes to an Operator
72 Services Platform for handling by an Operator. The Operator Services Platform launches
73 LIDB queries for calling cards, collect calls, and bill to third party requests. TOPS is
74 simply the Nortel (vendor) name for Operator Services Platforms that it manufactures.

75

LIDB 6: Should MCIIm be prohibited from using LIDB information other than for its end user customers in SBC Illinois?

(LIDB Section 7.2, 3.2.1.1, 3.24, 4.3)

Q. WHAT IS THE ISSUE FOR LIDB 6?

A. There are several issues, but I address only the issue raised by section 4.3. All other issues are addressed by SBC Illinois witness Tricia Pellerin.

Q. WHAT IS THE DISPUTE SURROUNDING LIDB SECTION 4.3?

A. This language addresses the technical requirements for formatting a query to the LIDB database. Since SBC Illinois' proposed language for LIDB section 4.3 is nearly identical to our proposal for CNAM section 8.3 (CNAM Issue 8 & 9), I refer the Commission to my discussion of this issue in CNAM 8 & 9, set out below.

LIDB 7: SBC Illinois: Should a CLEC have the ability to determine which LIDB and CNAM databases are queried?

MCIIm: Should SBC Illinois' choice of which LIDB query it uses be subject to nondiscriminatory and parity obligations?

(LIDB Section 3.4)

Q. WHAT IS SBC ILLINOIS' POSITION ON THIS ISSUE?

A. SBC Illinois should have sole discretion in determining which LIDB database is queried by an SBC Illinois switch, OSP, or other service platform. Patricia Pellerin discusses how

SBC Illinois decides which database to query. My testimony explains how all queries launched by that switch, OSP, or other service platform will occur in parity, regardless of whether the query is launched on behalf of SBC Illinois or a CLEC.

Q. WHAT IS MCIM'S POSITION ON THIS ISSUE?

A. MCIm witness Lehmkuhl does not address this issue with anything more than a passing reference. (Lehmkuhl lines 643-647). Read broadly, his argument appears to be that the data available to MCIm "should be the same data available to the providing LEC". (Lehmkuhl lines 624-625). This concern is fully addressed by SBC Illinois' language because section 3.2 already establishes the "nondiscrimination" standard in agreed-upon language. Moreover, from a technical perspective, the same LIDB data is available to MCIm as is available to SBC Illinois, regardless of which party initiates the database query from SBC Illinois switch.

Q. IS IT POSSIBLE THAT SBC ILLINOIS COULD CHOOSE TO QUERY A LIDB DATABASE THAT TREATS CLEC ULS END USERS DIFFERENTLY THEN SBC ILLINOIS' END USERS?

A. No. All queries launched from SBC Illinois to SNET DG's LIDB are launched from an Operator Services Platform ("OSP"). CLECs that use SBC Illinois' local switching, including MCIm, generally use the same OSP that SBC Illinois' end users use. CLECs *do* have the option to use customized routing to route their Operator Services traffic to a

different OSP, but that is rarely done, and MCIm does not currently use customized routing in Illinois. Queries from the OSP for SBC Illinois and CLEC end users are launched in an identical fashion, with no identification to differentiate the carriers. Those queries are sent to the STP, which is also unable to distinguish between SBC Illinois and CLEC end users. The STP then sends those queries to the appropriate LIDB that contains the information (which may or may not be SNET DG's LIDB). Third-party SS7 and database providers, such as SNET DG, also cannot distinguish between an SBC Illinois query and a CLEC query that originates from an SBC Illinois OSP. Therefore, when SBC Illinois enters into an agreement to query a LIDB database, MCIm's end users will query the same LIDB that SBC Illinois end users do. Any concerns about discrimination are inherently addressed by the way the network operates.

LIDB 10: Which Party's statement of LIDB query cost recovery should be included in Appendix LIDB?
(LIDB Section 6.2)

Q. WHAT IS THE ISSUE IN DISPUTE?

A. This issue concerns rate application. Namely, whether the rate for the ULS port already covers all LIDB queries launched from that port, or whether other charges apply.

Q. WHAT IS MCIM'S POSITION ON THIS ISSUE?

A. Mr. Lehmkuhl addresses this issue briefly in just a few lines and does no more than assert – without support – that query charges are included in the ULS port charge.

(Lehmkuhl lines 751-756). Dr. Currie explains that SBC Illinois' ULS port charge does *not* recover the cost of LIDB queries, so MCI's proposed language is clearly wrong.

Q. WHAT IS SBC ILLINOIS' POSITION ON THIS ISSUE?

A. SBC Illinois' language correctly states that LIDB charges are recovered by the network element that causes the LIDB database to be queried. For example, when a CLEC purchases unbundled local switching, one of the capabilities it gains for its end users is the ability for them to access the Operator Services Platform to make alternately billed calls (collect, calling card, and third number billed calls). These calls require a query to validate whether the billing account is allowed to accept the billing (to reduce fraud and uncollectibles). These queries are launched from the Operator Service Platform and may go to any of the LIDBs across the nation (SBC Illinois' LIDB is not a national database). Because a LIDB validation query is an Operator Services generated query in support of an Operator Services offering, the charges for the Operator Services offering will recover this cost, just as all other Operator Services-related costs are recovered by the Operator Services rates. SBC Illinois' language accurately describes this arrangement and should be included in the Agreement.

III. CNAM ISSUES (1, 2, 3, 8, & 9)

Q. WHAT IS CNAM?

A. CNAM stands for Calling Name, and is a call-related database used to provide end users with services such as Caller ID w/ Name. CNAM information contains a 15 character alpha-numeric string and a privacy indicator that identifies if an end user wants its name

displayed on outgoing calls, or if it would prefer the name to be withheld. However, the privacy indicator is a rather outdated field as the FCC has since mandated¹ that end users have the ability to display or block their numbers, and therefore their names, on a per call basis. Any products created from CNAM should likewise rely not on the privacy indicator contained in the CNAM database, but on the privacy indicator contained in the originators' call.

Q. DOES SBC ILLINOIS HAVE A CNAM DATABASE?

A. Yes. Unlike LIDB, for which SBC Illinois uses SNET DG, SBC Illinois does have a CNAM database. The CNAM database resides on the Advanced Intelligent Network (AIN) platform.

CNAM 1: Should SBC Illinois be required to provide bulk access to the CNAM database in addition to query access?

(CNAM Section 3 – 3.1.2)

Q. WHAT IS THE ISSUE FOR CNAM 1?

A. CNAM Issue 1 asks whether SBC Illinois is required by the Act to provide MCIm a bulk download of its entire CNAM database, rather than access on a per query basis.

Q. WHAT IS MCIM'S POSITION ON THESE ISSUES?

¹ 47 CFR 64.1601

187 A. MCIIm states that SBC Illinois is required to provide nondiscriminatory access to CNAM
188 and that access should equate to bulk access. In the direct testimony filed by Mr.
189 Lehmkuhl², he argues that the dialing parity provisions of Section 251 (b)(3) of the
190 Telecommunications Act require SBC Illinois to provide bulk downloads of its entire
191 CNAM database. His argument is based on two assertions, each of which is wrong.
192 First, he asserts that the section 251(b)(3) dialing parity requirements that apply to
193 Directory Assistance Listing Information (DALI) also apply to the CNAM database.
194 Second, assuming that the dialing parity requirements apply to CNAM, he asserts that
195 MCIIm does not have “nondiscriminatory access” to CNAM information without
196 receiving bulk downloads from SBC Illinois.

197
198 **Q. WHAT IS SBC ILLINOIS’ POSITION ON THESE ISSUES?**

199 A. MCIIm is wrong on both counts. First, Ms. Pellerin and I both explain why the dialing
200 parity requirements of Section 251(b)(3) of the Act do not apply to CNAM information—
201 Ms. Pellerin addresses the issue from a legal and policy perspective while my comments
202 are focused on the technical aspects of MCIIm’s assertion. Second, I explain why MCIIm
203 does not suffer from any “discriminatory” treatment at the hands of SBC Illinois.

204
205 **Dialing Parity**

206 **Q. WHY IS IT IMPROPER TO LINK THE CNAM DATABASE TO DIALING**
207 **PARITY AS UNDER SECTION 251 (B)(3) OF THE ACT?**

² Direct Testimony of Mr. Michael J. Lehmkuhl in behalf of MCIIm, line 111 – 125.

A. Dialing parity under Section 251 (b)(3) is —“The duty to provide dialing parity to competing providers of telephone exchange service and telephone toll service, and the duty to permit all such providers to have nondiscriminatory access to telephone numbers, operator services, directory assistance, and directory listing, with no unreasonable dialing delays.” CNAM is not included among the functions listed and CNAM does not affect the functions listed in any material way.

Q. PLEASE EXPLAIN.

A. The CNAM database is not related to access to telephone numbers, Operator Services, Directory Assistance, or MCIm’s ability to complete calls without unreasonable dialing delays. Directory Assistance and directory listings help end users to obtain addresses and/or telephone numbers. Operator Services assists end users in completing calls, and to bill to alternate numbers. Telephone numbers are obtained, and regulated by the third-party NANPA whose responsibilities are outlined by the FCC. CNAM provides none of the above functions.

Q. DOES ACCESS TO THE CNAM DATABASE HAVE ANYTHING TO DO WITH MCIM’S ABILITY TO OBTAIN ASSIGNMENT OF TELEPHONE NUMBERS?

A. No. Telephone numbers are assigned by NANPA (“North American Numbering Plan Administration”) which holds overall responsibility for the neutral administration of NANP numbering resources, subject to directives from regulatory authorities in the countries that share the NANP.

Q. DOES ACCESS TO THE CNAM DATABASE HAVE ANYTHING TO DO WITH MCIM'S ABILITY TO OBTAIN ACCESS TO OPERATOR SERVICES?

A. The CNAM database is not an Operator Service. Operator Services are services that require the assistance of an operator. CNAM databases do not require the assistance of an operator. CNAM databases are call-related databases to which operators do not have access.

Q. DOES ACCESS TO THE CNAM DATABASE HAVE ANYTHING TO DO WITH MCIM'S ABILITY TO OBTAIN ACCESS TO DIRECTORY ASSISTANCE?

A. The CNAM database is not a directory assistance database. Directory Assistance provides telephone number, name and address information to callers wanting to make calls. CNAM database provides name information to calls that have already been made.

Q. DOES ACCESS TO THE CNAM DATABASE HAVE ANYTHING TO DO WITH MCIM'S ABILITY TO OBTAIN ACCESS TO DIRECTORY LISTINGS?

A. No. Directory Assistance providers have their own database listing information and do not interact with CNAM databases.

Q. DOES ACCESS TO THE CNAM DATABASE CREATE ANY UNREASONABLE DIALING DELAY?

A. No. Per query access (rather than a bulk download of the CNAM database) does not affect MCIm's ability to complete calls without unreasonable dialing delays. When an end user places a call, the number must have already been dialed before the call-related

254 database is queried. In the case of CNAM, the call will have already been received by
255 the terminating end office before the query is even launched. MCIm must agree with this
256 technical fact, because Mr. Lehmkuhl acknowledges that “the information retrieved from
257 the database is then routed over the network so that it is viewable on a subscriber’s
258 equipment to identify the caller before the second ring cycle.”³ In short, the fact is that
259 accessing CNAM information on a per query basis does not cause any “unreasonable
260 dialing delay” and MCIm does not contend that it does.
261

262 **Q. MCIM MAKES MUCH OF THE FACT THAT THE FCC HAS ORDERED LECS**
263 **TO PROVIDE A DOWNLOAD OF THE DAL. WHAT IS DAL?**

264 A. DAL, or Directory Assistance Listings, is a bulk download of directory assistance
265 information that all local exchange carriers are obligated to provide to requesting carriers
266 under the express language of Section 251(b)(3) of the Act. A CLEC may download
267 DAL so that it can provision DA itself, or it may use SBC Illinois as its wholesale
268 provider of directory assistance.
269

270 **Q. ARE DAL AND CALL-RELATED DATABASE INFORMATION SIMILAR IN**
271 **NATURE?**

272 A. No. DAL is required to obtain the directory listing for the number you wish to dial. Call-
273 related databases, such as CNAM, are only encountered after the call has been made.

³ Direct Testimony of Mr. Michael J. Lehmkuhl in behalf of MCIm, line 61-64.

**Q. HOW DOES MR. LEHMKUHL ATTEMPT TO LINK DAL AND THE CNAM
CALL-RELATED DATABASES TOGETHER?**

A. He doesn't—at least not in sufficient detail to make the comparison meaningful. On line 202 of Mr. Lehmkuhl's testimony he states that call-related databases are similar in nature to DAL. At lines 123-124, Mr. Lehmkuhl states that CNAM is a "collection of names associated with telephone numbers used to facilitate dialing parity". However, that is the beginning, middle, and end of his attempted comparison. The simple truth is that they are not alike in any way that is relevant to this issue. DAL assists the end user in making a call; call-related databases do not. DAL is encountered before the call is dialed; call-related databases are encountered after. DAL is expressly mentioned in 251(b)(3); CNAM is not.

Non-Discrimination

Q. DOES MCIM OFFER DOWNLOADED ACCESS TO ITS CNAM DATABASE?

A. Although I am not privy to all the services that MCIm offers, I searched its website, which lists many, if not all, its current service offerings and I could not find a CNAM download amongst them. To the best of my knowledge it offers no such product. If MCIm does not offer a download of its existing CNAM database then that policy would

run counter to Mr. Lehmkuhl's statement that: "Only download access is
nondiscriminatory access."⁴

**Q. PAGE 15 OF MR. LEHMKUHL'S TESTIMONY STATES THAT IT IS
DISCRIMINATORY FOR MCIM TO PAY FOR TWO SETS OF SS7
FACILITIES. HOW DO YOU RESPOND?**

A. Mr. Lehmkuhl is stating that MCIm must purchase SS7 links to query SBC Illinois' database and also must build their own SS7 links to query their own CNAM database. This concern is overblown. Where MCIm uses SBC Illinois' switch to provide service, MCIm queries the CNAM database over SBC Illinois' SS7 facilities and does not have to pay per query, nor pay extra for the SS7 facilities (unlike LIDB, they are included in rates related to the ULS port). Where MCIm is a switch-based provider, it has already established links to connect to SBC Illinois' SS7 for the purpose of exchanging signaling information that is required to complete ordinary calls. MCIm has made no showing about any additional SS7 facilities it would have to establish solely for the purpose of submitting CNAM queries to SBC Illinois for end users served by MCIm's own switch.

In any event, I disagree with MCIm's basic assumption that the process of querying another carrier's database is inherently discriminatory because of the extra costs that are incurred. All carriers, including SBC Illinois, routinely query the databases of other

⁴ Direct Testimony of Mr. Michael J. Lehmkuhl in behalf of MCIm, line 361.

carriers for CNAM and other information because that is where the data is. MCI's
premise, taken to its logical conclusion, is that all carriers must provide all call-related
database information to all other carriers, so that no carrier will ever again need to query
a database outside its network. That vision has no support in Section 251(b)(3) dialing
parity obligations and it is totally divorced from the way all carriers access information
today.

**Q. PAGES 15 THROUGH 18 OF MR. LEHMKUHL'S TESTIMONY STATES
ADDITIONAL REASONS WHY PER QUERY ACCESS IS ALLEGEDLY
DISCRIMINATORY. HOW DO YOU RESPOND?**

A. Mr. Lehmkuhl's arguments again only apply to switch-based providers, and his
arguments simply describe the circumstances that all switch-based providers face. This is
not discrimination; it is simply part of a carrier's decision to deploy its own switching.
Further, his complaints are completely unsubstantiated. For example, he argues that
accessing call-related databases outside MCI's network creates unnecessary
complications for "routing instructions within its signaling network" (Lehmkuhl line
419). He does not provide any facts to back up this assertion, but I discount this concern
because it can be no different that the routing instructions that any carrier – including
SBC Illinois – has to follow to query databases outside its own network. He also
complains that the lack of a CNAM database has interfered with its ability to develop
"innovative service offerings". (Lehmkuhl line 432). The only example he describes –
routing with TCP/IP protocol rather than SS7 protocol – is merely a different transmission

technology. Moreover, MCI's arguments directly conflict with the FCC's finding that "WorldCom has constructed their own CNAM database that is accesses using its own signaling network."⁵

Q. DOES SBC ILLINOIS QUERY THE CNAM DATABASES OF OTHER CARRIERS?

A. Yes. SBC Illinois operates a regional, not a national CNAM database. Therefore, it queries other CNAM databases which it does not own when it wants to return calling name information to its caller ID subscribers. SBC Illinois is authorized to query the CNAM databases of VeriSign (where MCI stores its name information for its switch-based end users), Verizon (for the former GTE and Bell Atlantic areas), SBC West, SBC Southwest, SNET DG, BellSouth, and Accudata. There are many other databases that SBC Illinois does not query. SBC determines which databases it wants to query based upon the needs of its Caller ID with Name product. It then negotiates a query access agreement with the database owner and translates its network to route query traffic to the database provider.

Q. IF A CARRIER DECIDES THAT IT MAKES ECONOMIC AND STRATEGIC SENSE TO DEVELOP ITS OWN DATABASE, RATHER THAN QUERY ANOTHER CARRIER'S CALL-RELATED DATABASE, CAN IT DO SO?

⁵ TRO Paragraph 554.

A. Absolutely. The FCC mentions several in the TRO⁶ – such as Illuminet who the FCC states offers nationwide CNAM delivery for wireline and wireless carriers; Sprint, whom the FCC adds is a national database provider; Targus, which offers a CNAM database with over 140 million names. Additionally, a quick search via the internet turned up several additional providers, a few of which I cite below, who also offer CNAM databases:

Accudata Calling Name service retrieves stored names associated with a telephone number. This allows Exchange Carriers to display a name from an inbound call originating anywhere in the North American Numbering Plan area. We can even enable CNAM display for wireless providers.⁷

Syniverse provides a national CNAM database query system that enables access and delivery of calling party names from the Syniverse national CNAM database to wireless and wireline carriers providing caller name identification services. This low- cost alternative to traditional CNAM processing utilizes national directory assistance data as the initial source.⁸

Coppercom: Integrated SS7 services platform which offers Alink consolidation, A-link concentration, alias point code, and local SCP database features such as LNP, CNAM and 800 services.⁹

LSSi's WhoDA service brings all the benefits of a national database to Calling Name services. WhoDA uses the LSSi Database, which is updated daily with service-order-level data from the Incumbent Local Exchange Companies. This data is converted into the format necessary to be used as the CNAM portion of the LIDB.¹⁰

Syniverse and LSSi are just some of the entities that have created a national CNAM database using DALI as the source data. Such a database would be more comprehensive

⁶ TRO Paragraphs 553-554.

⁷ http://www.accudatech.com/sp_cnam.htm

⁸ http://www.syniverse.com/content.cfm?section_id=2&page_id=17&ID=122&ServiceTypeID=3

⁹ <http://www.coppercom.com/solutions/cap.asp>

¹⁰ <http://www.lssi.net/>

than a CNAM database downloaded from SBC Illinois because all LECs are required to provide DAL information, thus one could gather the directory listings from every end user in the state – not just from a single carrier. SBC Illinois' CNAM database only houses the data from SBC Illinois' end users and those providers who choose to house that data with SBC Illinois. Clearly all roads do not lead to SBC Illinois, as Mr. Lehmkuhl states¹¹. Rather, MCIm should utilize the tools and database that it already owns to develop the CNAM database capabilities it desires.

CNAM 3: If bulk downloads are required, should processes be delineated in the Interconnection Agreement?

(CNAM Section 4.8, 4.10, 4.11, 5.2, & 6.2)

Q. WHAT IS THE ISSUE FOR CNAM 3?

A. CNAM Issue 3 deals with the terms and conditions that would apply if SBC Illinois were required to provide such a bulk download. Of course, if the Commission properly finds in Issue 1, consistent with past Illinois precedent in the 271 case (Docket 01-0662), that SBC Illinois is not required to turn over its entire CANM database, then there is no need to address CNAM Issue 3 at all.

Q. WHAT DOES MCIM WANT?

A. MCIm stipulates that a host of requirements be included in the ICA pursuant to any possible obligation to provide a download. For example, they want an electronic download within 30 days of a request (4.8). Also, they want daily electronic updates

¹¹ Direct Testimony of Mr. Michael J. Lehmkuhl in behalf of MCIm, page 5.

(4.10). Section 4.11 additionally dictates the terms that SBC Illinois' would have to provide an additional download to MCIIm free of charge.

Q. IF THE COMMISSION WERE TO REQUIRE SBC ILLINOIS TO PROVIDE A BULK DOWNLOAD OF THE ENTIRE CNAM DATABASE, WOULD THOSE BE REASONABLE TERMS AND CONDITIONS?

A. No. SBC Illinois believes that no obligation exists to provide such a download in the first place. To the extent that this Commission rules otherwise, such an obligation would apply to all LECs and therefore, all parties should have input into what those terms and conditions should be. As a result, SBC Illinois has not engaged in the daunting task of determining which of MCIIm's "terms" can be complied with. Thirty days is then obviously an unreasonable time frame to accomplish such an exhaustive effort for a product that SBC Illinois believes it has no obligation to provide.

Q. MCIM PROPOSES IN SECTION 4.10 THAT UPDATES TO THE CNAM DOWNLOAD SHOULD BE PROVIDED ON A DAILY BASIS. DOES SBC ILLINOIS AGREE?

A. No. Allowing MCIIm a download of the CNAM database makes MCIIm a provider of SBC Illinois' end users data. As such a provider, MCIIm should be required to treat that data in parity with its own end users. SBC Illinois does not delay or relegate MCI's CNAM updates to a once daily data transfer. Such a process allows for old and outdated information. Affected customers will complain not to MCI, but to SBC Illinois to have their information updated.

429

430 **Q. MCIM ALSO IMPOSES TERMS IN SECTION 4.11 UNDER WHICH A**
431 **COMPLETE CNAM DATABASE WOULD HAVE TO BE PROVIDED AT NO**
432 **CHARGE. DOES SBC ILLINOIS AGREE?**

433 A. No. MCIm's language at Section 4.11 reads: "SBC Illinois shall provide a complete
434 refresh of the CNAM Database upon request and at no charge if MCIm can show that 500
435 or more records contained in the database are corrupt." MCIm's broad language does not
436 allow for individual fault. SBC Illinois may have provided the CNAM information with
437 no corruption whatsoever, but because of misuse by MCIm the data may become corrupt.
438 In such instances SBC Illinois should not be held responsible for the negligence of others.

439

440 **CNAM 2: Should SBC Illinois be required to provide MCIm with access to CNAM as**
441 **an Unbundled Network Element other than as part of Unbundled Local**
442 **Switching?**

443 **(CNAM Section 3-4)**

444

445 **Q. WHAT IS THE ISSUE FOR CNAM 2?**

446 A. Part of this issue relates to section 3 of the CNAM Appendix and is therefore identical to
447 the bulk download issue discussed in CNAM Issue 1, above. Other parts of this issue –
448 MCI's section 3.1 and SBC Illinois' section 4.3.1 – are addressed by Ms. Pellerin. The
449 final part of this issue -- and the only part I address here – relates to MCIm's objection to
450 section 4.12, which outlines the technical, industry-wide standards for querying,
451 administering, and storing CNAM data in the CNAM database.

452

453 **Q. WHAT IS SBC ILLINOIS' POSITION ON THIS ISSUE?**

454 A. SBC Illinois' position is that per query access to the CNAM database must conform to
455 the proper protocols as set forth by GR-1188-CORE, GR-1158-CORE, and GR-446-
456 CORE.

457

458 **Q. WHAT IS MCIM'S POSITION ON THIS ISSUE?**

459 A. MCIm does not offer a specific reason for rejecting SBC Illinois' language regarding the
460 proper formats for querying the CNAM database in either its DPL position statement or
461 direct testimony. Presumably, it objects to this language because it refers to CNAM
462 access "on a per query basis". This would be a short-sighted objection for two reasons.
463 First, a possible outcome of this arbitration is that, consistent with Illinois precedent,
464 MCIm is limited to per query access. Second, section 4.12 addresses technical standards
465 that go beyond per query access. In any event, all SBC Illinois is proposing is that
466 recognized industry standards define the information that will be contained in the CNAM
467 database and define the administration of that database. In the absence of any specific
468 objection raised by MCIm, this language should be adopted by the Commission.

469

470 **Q. WHAT ARE GR-1188-CORE, GR-1158-CORE, AND GR-446-CORE, AND HOW**
471 **DO THEY RELATE TO CNAM QUERIES?**

472 A. These documents are generic requirements written by Telcordia Technologies to
473 standardize industry practices so that vendors and telecommunications providers can
474 deploy equipment and services in compliance with industry standards. GR-1188-CORE
475 specifically deals with the generic requirements for Calling Name delivery. GR-1158-

CORE discusses LIDB in general and provides a data catalog or dictionary of LIDB data elements. GR-446-CORE discusses the requirements for the interface between LIDB and its administrative system.

CNAM 8 & 9: What forecasting requirements for CNAM should be included in this agreement?

(CNAM Section 8.1 – 8.4)

Q. WHAT IS THE ISSUE FOR CNAM ISSUES 8 AND 9?

A. There are three issues, each relating to a separate section under the “provisioning” heading of the CNAM Appendix:

Section 8.1 addresses network overload conditions;

Section 8.3 addresses technical requirements for formatting queries; and

Section 8.4 addresses forecasts of CNAM usage.

Q. WHY SHOULD THE COMMISSION ADOPT SBC ILLINOIS’ LANGUAGE FOR SECTION 8.1?

A. SBC Illinois’ language simply acknowledges that the CNAM database, and the SS7 network that enables queries to get to the CNAM database, can overload if there are an extraordinary volume of queries, and that if this happens SBC Illinois can implement network controls to prevent such a failure. The language requires SBC Illinois to implement any such controls on a nondiscriminatory basis, so the language should be unobjectionable.

499

500 **Q. WHY DOES MCIM OBJECT TO IT?**

501 A. MCIm does not explain that. Mr. Lehmkuhl says only that it is not acceptable because it
502 addresses per query access. (Lehmkuhl lines 872-875). That is no basis to reject this
503 language. The “bulk download” dispute is being addressed in CNAM Issues 1 and 3.
504 Regardless of the outcome of that dispute, the Agreement will still address per query
505 access for any use that MCIm might make of SBC Illinois’ Unbundled Local Switching.¹²
506 Because SBC Illinois’ language deals with a network operational issue in a reasonable,
507 nondiscriminatory fashion, and because it merely sets out in words what SBC Illinois
508 network technicians would be required by good management practices to do in any event,
509 the Commission should adopt it.

510

511 **Q. WHY SHOULD THE COMMISSION ADOPT SBC ILLINOIS’ LANGUAGE FOR**
512 **SECTION 8.3?**

513 A. This language addresses the technical requirements for formatting a query to SBC
514 Illinois’ CNAM database. Many different types of queries originate from a service
515 platform, such as an end office, to the STP. These include queries for CNAM, LIDB,
516 800 and AIN. The STP evaluates the Translation Type and the SubSystem Number

¹² There appears to be no dispute that per query access to the CNAM database is relevant only insofar as MCIm uses SBC Illinois’ unbundled local switching. Of course, SBC Illinois’ position in this arbitration is that *USTA II* has eliminated the requirement to provide ULS. Accordingly, the CNAM Appendix clearly states that SBC Illinois is providing access to the CNAM database only when queries are originated from any unbundled local switching that SBC Illinois is required to provide under this Agreement. (See section 4.1 of the CNAM Appendix).

parameters contained in those queries to determine which type query it is so that it can route the query to the appropriate database. As a pure matter of network operation, the Translation Type and the SubSystem Number must be specified before CNAM queries can take place. If a carrier were to send SBC Illinois a Translation Type and SubSystem Number that SBC Illinois does not designate for CNAM queries, then the query might misroute to an incorrect database, or more likely would fail altogether.¹³

Q. WHAT IS MCIM'S POSITION ON THIS ISSUE?

A. As with section 8.1, MCIm does not offer a specific reason for rejecting SBC Illinois' language. MCIm simply states that they will not query SBC Illinois' CNAM database. For the reasons I give in connection with section 8.1 above, the Commission should reject MCIm's argument and should adopt SBC Illinois' language.

Q. WHY SHOULD THE AGREEMENT CONTAIN SECTION 8.4 RELATING TO FORECASTING INFORMATION?

A. SBC Illinois needs usage forecast information to efficiently manage the planning efforts of its network. Such planning efforts benefit not only SBC Illinois and the customers it serves, but all carriers that use SBC Illinois' Unbundled Local Switching. It also benefits those carriers that merely interconnect with SBC Illinois on a facilities basis.

¹³ All of these arguments apply equally to LIDB section 4.3 (LIDB Issue 6).

Q. WHAT CNAM FORECAST INFORMATION DO CLECS PROVIDE?

A. Each CLEC typically provides two types of CNAM forecast information. The first is the number of queries that it expects to generate during the busiest hour of a day. The second is data storage and administration information. This is the number of records that the CLEC has, the size of those records, and the frequency of updates to those records.

Q. HOW DOES SBC ILLINOIS USE THE FORECASTED INFORMATION THAT CLECS PROVIDE?

A. SBC Illinois takes the CLECs' busiest hourly query rate and adds it to SBC Illinois' own busiest hourly query rate. This allows SBC Illinois to determine if its databases have enough processing capability. If not, SBC may need to add resources. The data storage and administration information helps SBC Illinois to determine whether it has adequate storage and update capacity for the number of records that are projected. This greatly assists SBC Illinois in providing the best possible service to both SBC Illinois and CLEC customers, without wasting resources. Consider the following example: When planning a wedding, food, drinks, and seating for all your guests must be provided. Thus, when invitations are sent out guests are asked to RSVP. This allows the host to estimate how many guests may attend. Thus, money is not needlessly spent on food for guests that won't arrive, and plenty will be available to feed all those who do attend.

Q. WHY DO CLECS NEED TO PROVIDE THIS CNAM FORECASTING INFORMATION?

559 A. SBC Illinois does not know how many queries CLECs expect to send. For example, a
560 CLEC could offer a promotional campaign designed to sell Caller ID with Name. As part
561 of that promotional campaign they could give each of their customers free Caller ID with
562 Name for 2 weeks. This would generate an increased amount of CNAM queries. Only
563 the CLEC is privy to its marketing plans, thus only the CLEC can provide this forecast
564 data.

565

566 **Q. WHAT HAPPENS IF THE CLECS DON'T PROVIDE RELIABLE**
567 **FORECASTING INFORMATION?**

568 A. Without reliable forecast information SBC Illinois may not be prepared to handle the
569 sudden upsurge in demand, and both SBC Illinois' end users as well as CLEC customers
570 may receive degraded service.

571 **IV. LIDB AS (LIDB 1 & LIDB AS 1)**

572 **Q. WHAT IS LIDB AND CNAM-AS?**

573 A. AS stands for Administrative System. These issues concern the terms and conditions for
574 the administration and storage for the LIDB and CNAM records that CLECs submit.

575 **LIDB 1:** **SBC Illinois: What terms and conditions should apply to the administration**
576 **and storage of LIDB and CNAM records?**

577 **MCIIm: Should SBC be responsible for administering the Line Records for**
578 **MCIIm's end-user customers served via UNE-P in the same manner that SBC**
579 **administers its Line Records for its retail end-user customers and in**
580 **accordance with the 13-state CMP process?**

581

582 **LIDB and CNAM AS 1:** **SBC Illinois: What terms and conditions should apply to the**
583 **administration and storage of LIDB and CNAM records?**

584 **MCIIm: For non-UNE-P MCI end-user customers whose**
585 **information is not stored in SBC's LIDB database, should this**
586 **ICA include a provision to address how SBC should administer**
587 **such customer's line?**

588

589 **(LIDB and CNAM AS Section 1, LIDB Section 7.5, UNE Section 17.5)**

590

591 **Q. WHAT IS THE ISSUE FOR LIDB 1 AND LIDB AND CNAM AS 1?**

592 A. The issue addresses the responsibility for administration of CLEC data. Patricia Pellerin
593 and I each address this issue. My testimony outlines how, from a practical standpoint,
594 SBC Illinois does not have any knowledge of what LIDB and CNAM services a CLEC's
595 end user wants and therefore SBC Illinois cannot administer the data. SBC Illinois does,
596 however; offer three different methods for CLECs to input their end user data into the
597 appropriate LIDB or CNAM database, so that CLECs can administer their end user data.

598

599 **Q. WHAT IS SBC ILLINOIS' POSITION ON THIS ISSUE?**

600 A. The CLEC is responsible for inputting its own user data into the LIDB and CNAM
601 databases. SBC Illinois merely provides the database and the interface so that CLECs

can manage, input, change, and delete their end user's data. This is the responsibility of the service provider of the end user and cannot be shifted to SBC Illinois. SBC Illinois' language accomplishes this result and should be adopted.

Q. WHAT IS MCIM'S POSITION ON THIS ISSUE?

A. MCIm disputes all language in this Appendix. Without this Appendix, however, there would exist no provision for the proper administration and storage of the CLEC's data.

Q. WHAT DATA IS BEING DISCUSSED?

A. The data in dispute is the CLECs' end user information associated with UNE-P accounts (e.g., their customers' information, such as what name the customer wants displayed on Caller ID with Name services; or whether the customer accepts collect calls).

Q. DOES SBC ILLINOIS HAVE THIS DATA?

A. SBC Illinois does not have this information. Only the CLEC can obtain this information from its customer.

Q. WHAT METHODS DOES SBC ILLINOIS HAVE IN PLACE FOR CLECS TO INPUT THEIR DATA INTO THE LIDB AND CNAM DATABASES?

A. SBC Illinois offers three methods that CLECs can use to administer CLEC data. These are the Interactive Interface, the Service Order Entry Interface, and the LSR process.

Two of these interfaces, (the Interactive Interface and the Service Order Entry Interface), are electronic interfaces, which allow direct access to the LIDB and CNAM administration systems. The Interactive Interface is PC-based and allows CLECs to administer their accounts on a record-by-record basis through an interactive screen. The Service Order Entry Interface is designed to allow CLECs to connect their back office systems to the administrative system to update many records at one time). The LSR process is an alternative to direct system access that allows CLECs to input their information in the form of a Local Service Request (LSR); which is then converted by SBC Illinois' OSS to the LIDB Administrative System which updates LIDB. The database will then contain the information input via the LSR. SBC Illinois provides the database for CLECs' customers, but SBC Illinois can only provide them with an accurate database as long as CLECs submit accurate information.

Q. IF REQUIRED, COULD SBC ILLINOIS EFFECTIVELY ADMINISTER CLEC DATA?

A. No. SBC Illinois does not know what LIDB or CNAM services CLEC end users want. For example, SBC Illinois does not know whether the CLEC customer wants to accept collect calls. The customer tells the CLEC, the CLEC inputs the information through its selected interface, and the end user's selection gets populated in the database. SBC Illinois simply provides the means (e.g., hardware, software, methods, and procedures) for CLECs to create, modify, update, and delete their customer's records.

Q. DOES MCIM STORE ITS CUSTOMER INFORMATION IN SBC ILLINOIS' CNAM DATABASE AND SNET DG'S LIDB DATABASE?

A. Yes, to both questions. MCIm currently has end users that are served by SBC Illinois' end office switches. MCIm has end user records stored in the associated CNAM and LIDB databases. The provisions in SBC Illinois' CNAM and LIDB AS Appendix were adopted by Commission last year in the AT&T arbitration in Docket 03-0239 and should similarly be adopted in this proceeding.

V. 800 (1 & 3)

Q. WHAT IS AN 800 DATABASE?

A. The 800 database is a call-related database, like LIDB and CNAM. 800 numbers are not defined by a geographic location like an ordinary number. The same 800 number could belong to a software company in California or a peach orchard in Georgia. When an SBC Illinois or CLEC customer dials an 800 number, the end office switches do not know how to route the 800 number like they do an ordinary number. The end office switches must first "query" the 800 database to find out how to route the 800 call. The 800 database will return to the end office switches information about the 800 number (i.e., the ordinary POTS number with which the 800 number is associated) that the end offices can then use to route the call. The end office queries the 800 database over the SS7 network, in a manner similar to a LIDB query. There are approximately 20 pairs of 800 databases in the U.S.

667

668 **Q. HOW ARE 800 DATABASES UPDATED?**

669 A. Data into the 800 databases is input via the SMS/800, which is a centralized system that
670 performs toll-free (800, 877, 888, and 866) number management on a national basis. All
671 service providers that assign toll-free numbers for use within the U.S. must use the
672 SMS/800. The SMS800 database is used to verify the availability of specific numbers. It
673 can reserve numbers and also create and update customer records. Once created,
674 SMS/800 records are filtered and directed to only the 800 databases that needs the
675 information. This process assures that only those 800 databases which are expected to
676 handle traffic related to an individual toll-free number have a record associated with that
677 number. Most carriers have (or can get) authorization to interact with the SMS800
678 database to reserve numbers, create customer records and to update those records.

679

680 **800 1: Should MCIm be permitted to copy, store, or maintain 800 database**
681 **information from SBC Illinois?**

682 **800 3: SBC Illinois: Under what circumstances should SBC be required to provide**
683 **MCIm with access to its 800 database?**

684 **MCIm: In what manner should SBC Illinois provide MCIm with access to**
685 **its 800 database?**

686 **(800 Section 3.2, 3.8, & 4.2)**

687

688 **Q. WHAT IS MCIM'S POSITION ON THIS ISSUE?**

689 A. MCIm attempts to apply its same contention that the 800 database should be provided on
690 an unbundled basis per dialing parity obligations as defined by Section 251 (b)(3).
691

692 **Q. WHAT IS SBC ILLINOIS' POSITION ON THIS ISSUE?**

693 A. First, as is the case for the CNAM database, the 800 database does not fall under any
694 section 251(b)(3) dialing parity requirement. Like CNAM, it is a call-related database
695 that is not mentioned anywhere in the text of section 251(b)(3). And like CNAM, there is
696 no FCC precedent requiring LECs to provide downloads of the entire 800 database.
697 Moreover, the 800 database should not be provided on a downloaded basis as that would
698 circumvent the established method that the FCC dictated for the deployment and
699 administration of 800 services.

700

701 **Q. DOES ACCESS TO THE 800 DATABASE RELATE TO MCIM'S ABILITY TO**
702 **OBTAIN ASSIGNMENT OF TELEPHONE NUMBERS, OPERATOR SERVICES,**
703 **DIRECTORY ASSISTANCE, DIRECTORY LISTINGS?**

704 A. No. In my CNAM testimony, I state how MCIm accesses these services. Parity access to
705 the SMS/800 to obtain 800 numbering resources is obtained through parties known as
706 Resp Orgs or (Responsible Organizations); MCIm is registered as a Resp Org in at least 5

names.¹⁴ In addition, MCIIm has made no attempt to relate the 800 database to any of these functions.

Q. DOES ACCESS TO THE CNAM DATABASE CREATE ANY UNREASONABLE DIALING DELAY?

A. No. As in the case for CNAM queries, the end user must have already dialed the 800 number before the 800 database will be queried. Further, MCIIm has not contended that it has experienced any material delays in dialing due to this method of access.

Q. WHAT METHOD IN PARTICULAR DID THE FCC ESTABLISH FOR THE DEPLOYMENT OF 800 SERVICES?

A. On February 10th, 1993 the FCC¹⁵ held that the BOCs (Bell Operating Companies) are jointly responsible for the administration and access for the SMS/800. In response, the BOCs formed the SMT or SMS/800 Management Team. The SMT has final authority on all matters related to the SMS/800. Under the auspices of the FCC, the industry (including IXCs such as MCI) participated in industry forums to develop a single, unified system to allow most carriers to freely assign themselves 800 numbers, to automatically update all 800 databases simultaneously and to provide access to these databases to all carriers at FCC-tariffed rates.

¹⁴ MCI - MCI01, MCI Wholesale - MCW22, MCI Wholesale - WIL01, MCI Wholesale - WIL04, MCI WorldCom - LDD.

¹⁵ Provision of Access for 800 Service, Order, CC Docket No. 86-10, 8 FCC Rcd 1423 (1993) (CompTel Declaratory Ruling). FCC 93-84, released: February 10, 1993.

**Q. HOW COULD THIS ARRANGEMENT BE CIRCUMVENTED BY AN 800
DATABASE DOWNLOAD?**

A. Nothing in the FCC's 800 database regime requires ILECs to provide access to 800 numbers on a download basis. It would make little sense for a carrier such as MCI to construct its own 800 database outside the structure of the national 800 database system, which is apparently what MCI has in mind.

**Q. HAS THE FCC GIVEN ANY INDICATION ON HOW 800 SERVICES SHOULD
BE ACCESSED AND CHARGED?**

A. Yes, the R&O Toll Free Service Access Codes, CC Docket No. 95-155, ¶ 42 states that "For purposes of addressing the tariffing issues raised in the NPRM, we must consider the Commission's action in the 800 Rate Structure Order. In that Order, the Commission determined that LECs must price basic 800 database services on a per-query basis and that LECs subject to price cap regulation must treat basic 800 database service as a "restructured service." The Commission found that a per-query charge for 800 database service was appropriate because database queries are a distinct part of the set up of an 800 call and a per-query charge best reflects the costs of providing access to the 800 database."

**Q. ARE THERE OTHER CONCERNS ASSOCIATED WITH DOWNLOADING
THE 800 DATABASE?**

747 A. Yes. Access to the SMS/800 records requires a contract between the SCP
748 Owner/Operator and the SMT. Historically, this access has taken the form of a "link"
749 between the SCP Owner/Operator's 800 database and the SMS/800. Once this link is in
750 place the SMS/800 will begin sending 800 records that are "pruned" prior to being sent to
751 the 800 databases. This process assures that only those databases which are expected to
752 handle traffic related to an individual toll-free number have a record associated with that
753 number. The process also reduces the 800 database storage requirements by only
754 downloading that portion of the customer record that involves the territory covered by
755 that particular 800 database. Databases constructed without the virtue of this
756 arrangement would not be updated by the SMS/800 database. Using a database in a
757 stored or copied manner would soon be out of date and would subject end users to
758 degraded service and misrouted calls. For example, an end user that dialed an 800
759 number and was connected to a database that was not updated or would not be able to
760 complete its call. Moreover, customer A might discontinue its 800 number and that same
761 number might be purchased by Customer B. A copied database might inappropriately
762 attempt to route those calls to Customer A if it used obsolete stored information. To the
763 extent that MCIm wants an 800 database, it must own or control an SCP and must
764 contract with the SMT for the proper method to house and maintain the 800 data. None
765 of this would happen through SBC Illinois.

766
767 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

768 A. Yes.